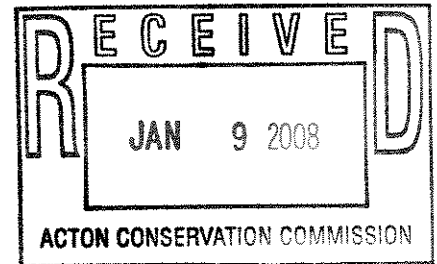




The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

January 8, 2008

Secretary Ian A. Bowles
Executive Office of Energy & Environmental Affairs
Attn: William Gage, MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114



RE: Quail Ridge Country Club, Acton, MA. MHC #RC.28633, EOE #12503

Dear Secretary Bowles:

Staff of the Massachusetts Historical Commission have reviewed a Notice of Project Change (NPC) for the project referenced above. The proposed project change consists of the construction of a 170-unit Senior Residence known as The Residences at Quail Ridge (TRQR), and associated infrastructure at Quail Ridge Country Club in Acton. The plan for the wastewater disposal system (NPC, Appendix G) was not included in the copy of the NPC submitted to the MHC.

As you know, MHC previously reviewed the ENF, FEIR and a NPC for this project in 2002 and 2003. An intensive (locational) archaeological survey (950 CMR 70) conducted for the project identified potentially significant historical archaeological sites, including fourteen historic quarry locations, a stone platform, a stone bridge abutment, and a historic farmstead known as the Quail Ridge Farm/Homestead Site, since recorded in the Inventory of Historic and Archaeological Assets of the Commonwealth (MHC # ACT.HA.2, 3, and 4).

The FEIR included a summary of the archaeological survey findings, and indicated (FEIR, pp. 1-5, 6-4) that further consultation would occur with the MHC to assist in addressing project impacts to the archaeological sites.

MHC's (3/25/2002) comments on the FEIR recommended that the potentially significant archaeological sites be avoided during construction through the implementation of an archaeological site avoidance and protection plan. If the sites could not be avoided, an archaeological site examination (950 CMR 70) and photodocumentation and field survey was requested.

The Secretary's Certificate on the FEIR (4/1/2002) included consultation with the MHC to develop mitigation measures to resolve project effects to the archaeological sites. MHC has not been contacted since the review of the FEIR.

Review of aerial photographs and NPC (page 41, section 7, Archeological Resources) determined that construction of the proposed 18-hole golf course has proceeded. Quarry stones bearing markings and drill holes have been used as landscape features and tee markers and are proposed to be reused in the TRQR portion of the project area for trailheads, street signs, numbering and landscape features. The presently proposed TRQR is located in areas with historic resources.

MHC is unable to determine the present condition of the archaeological sites, so that MHC can offer comments to assist to avoid, minimize, or develop suitable mitigation measures.

MHC requests that an archaeological site inspection survey be conducted by a qualified cultural resource management firm, to document the current condition of the archaeological sites and to offer recommendations. The report of the survey should include scaled project plans showing existing and proposed conditions for the project, including the associated infrastructure with the locations of the archaeological sites clearly indicated.

The FEIR indicated that a US Army Corps of Engineers permit was required for the project. The TRQR also includes a wetlands crossing, but the NPC does not indicate that a Corps permit is required. MHC requests that the project engineer clarify the status of the Corps permitting, and whether or not a Corps permit is required for the TRQR project. If so, the Corps will consult with the MHC on the project effects to the archaeological sites.

These comments are provided to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), Massachusetts General Laws Chapter 9, Sections 26-27C (950 CMR 70-71) and MEPA (301 CMR 11). Please feel free to contact Jonathan K. Patton at this office if you have further questions or require additional information.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Ronald Peabody, Quail Ridge Country Club, LLC
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